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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Plaintiff,

vs.

TESLA, INC.,

Defendant.

Case No. 3:23-cv-04984-JSC

**DECLARATION OF TIFFANY HART IN  
SUPPORT OF DEFENDANT TESLA, INC.’S  
MOTION TO STAY ALL PROCEEDINGS IN  
LIGHT OF LONG-RUNNING, CURRENTLY  
PENDING AND VIRTUALLY IDENTICAL  
STATE COURT LITIGATION**

Hearing Date: February 1, 2024  
Time: 10:00 AM  
Judge: Hon. Jacqueline Scott Corley  
Courtroom: 8

Complaint Filed: September 28, 2023

[*Defendant’s Notice of Motion and Motion;  
Declarations of Sara A. Begley, Thomas E.  
Hill, and Jessica Quon-Vaili; Request for  
Judicial Notice; Exhibits in Support of Motion;  
and Proposed Order, All Filed Concurrently  
Herewith*]

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1                    **DECLARATION OF TIFFANY HART**

2                    I, Tiffany Hart, declare as follows:

3                    1.        I am a Senior ER (Employee Relations) Partner at Tesla, Inc. (“Tesla”). I have been  
4 employed by Tesla since 2014. I have personal knowledge of the matters set forth herein, except  
5 where otherwise stated, and I could and would testify competently thereto, if called upon to do so. I  
6 submit this declaration in support of Tesla’s motion to stay all proceedings in the above-captioned  
7 matter.

8                    2.        As a Senior ER Partner with Tesla, I am familiar with Tesla’s employment and hiring  
9 policies, including its anti-harassment and non-discrimination policies. I also have access to and am  
10 familiar with Tesla’s Human Resources (HR) applications, databases, and business records, from  
11 which I am able to access compensation records and other employment data.

12                  3.        Since 2008, Tesla’s business has included manufacturing electric automobiles, and  
13 Tesla is now the world’s leading electric car company. In 2010, Tesla opened a large automobile  
14 manufacturing facility at 45500 Fremont Boulevard, Fremont, California (the “Factory”). In 2016,  
15 Tesla had more than 6,000 workers at the Factory. By 2022, that figure had grown to 22,000 workers.  
16 Tesla has made significant investments in the Factory since its opening, and the Factory is the last  
17 remaining auto manufacturing facility in California.

18                  4.        Year after year since 2010, Tesla has created more full-time manufacturing jobs for  
19 workers in California than any other in-state manufacturer. In so doing, Tesla has created thousands  
20 of jobs for people from diverse backgrounds and historically disadvantaged groups, including many  
21 who lack a college degree and/or prior work experience, or who have a criminal conviction. Tesla  
22 pays wages to workers at the Factory that exceed California’s average wage for manufacturing  
23 employees by a wide margin.

24                  5.        Tesla has a diverse and inclusive workforce in which a majority of its U.S. workers  
25 identify as minorities. As such, Tesla has long prohibited harassment and discrimination as a matter  
26 of company policy, and maintained robust, written anti-harassment and non-discrimination policies.  
27 True and correct copies of just some of those policies in force at Tesla and the Factory since 2011 are  
28

1 attached as **Exhibit E** to Defendant's Exhibits in Support of Motion to Stay All Proceedings in the  
2 above-captioned action.

3 I declare under penalty of perjury under the laws of the State of California that the foregoing  
4 is true and correct.

5 Executed this 13 day of December 2023, at Lathrop, California.

6 *Tiffany Hart*  
7 Tiffany Hart [Dec 13, 2023 14:00 PST]

8 Tiffany Hart

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